INITIAL INSPECTION FORM

Inspector(s):	Mark Fitzwater Matt Culpo	**Inspection Date:** **Inspection Time:** **Limiting Conditions:**	November 11, 2019 11 am

I. GENERAL:

Business Name:	Montana Rail Link		
Address:	1500 Railroad Avenue		
Phone:	406.370.5584 (cell) 406-447-2356		
Name and Title of Facility Representative(s) At Inspection:	Montana Rail Link Fred Fessended 406.439.2413		
Name and Title of Correspondence Contact Person:	Montana Rail Link Rick Shelley		
Type of Business/Operations:	Line Haul- Train Switching- Refueling- Maintenance Yard		
Average Production Rate:	N/A		
Number of Employees:	11	**Shifts:**	0700- 1500 1500-2300 2300-0700
Normal Days of Operation:	☐ **5 days/week**	**X 7 days/week**	☐ **other** _____
Water Supplied By:	City of Helena		
Is there an Industrial Waste Permit on file for occupant?	**X YES**	☐ **NO**	

II. SUPPLY:

Raw Materials/ Chemicals:	Diesel Fuel	Lubricant / Oil			
Use:	FUEL TRAINS	TRAIN MAINTENANCE			
Storage Location:	ON SITE	ON SITE			
Storage container (AST, UST, drum, tote, etc), number present, and size:	(2) 25,000 GALLON ABOVE GROUND PAINTED TANKS	(1) 1,000 GALLON ABOVE GROUND PAINTED TANK			

SUPPLY continued:

Staining/ evidence of spills:	NO	NO			
How are supply chemicals handled/ transferred to processing equipment/ area for use?	PUMP STATION PUMPS FUEL ABOVE GROUND TO FILLING STATION	PUMPED FROM TANK TO FUELING STATION			
Floor drains in storage/ handling/use areas? (Y/N)	NO	NO			
Location of floor drains in storage or use area?	N/A	N/A			
Adequate spill containment? (Y/N)	YES	YES			
If stored outside, are chemicals covered? (Y/N)	N/A	N/A			
Potential for spill to reach sanitary sewer or storm sewer? (Y/N)	YES	YES			

III. PROCESS/OPERATIONS:

Restaurant/ food preparation present?	**☐YES X NO**	**If YES, include additional oil/grease information:**
Photography, x-ray, or print shop?	**☐YES X NO**	**If YES, include additional silver information:**

PROCESS/OPERATIONS continued:

Sand interceptor:

Operation/Use	Present? (Y/N)	If YES, are floor drains present? (Y/N)	If YES, do floor drains connect to an interceptor? (Y/N)
Automobile Service station			
Train Maintenance	Yes	Collection pans	Yes
Mechanical repair shop			
Car/truck/heavy equipment washing	Yes	Collection pans	Yes
Garden nursery			
Warehouse			
Printing			
Spray paint booth			
Parking garage			
Other operations capable of producing sand/oil			

Description of processes/ operations at the facility:

Trains are refueled, serviced, and washed at the switching yard. The diesel fuel is pumped overhead from the pump station to the train, 130,000 gallons a month is pumped into the train engines. This fueling station has a new 6 inch delivery line as of 2017. The fueling station has been equipped with auto shut offs in case of emergency. There is also a grid drain to catch any spills of diesel fuel. Any spill would then drain to the lift station and be sent to the oil and water separator. The two 25,000 gallon diesel tanks have been equipped with auto shutoffs that cut flow when the level is within 1-2 ft of capacity. The fueling station has new curbing as of 2017 to direct any spills to the drain pans. Lubricants are used to refill oil reservoirs on trains as needed. The lubricant is stored in a 1,000 gallon tank and pumped to the usage station. They use approximately 330 gallons each month of lubricant. The lubricant tank has spill containment and has an overflow line that is also piped to the lift station to be sent to the oil water separator. This tank also has an auto cutoff on it. Trains are washed by R&R Mobile Wash 406-443-8391. Any spills and wash water is contained in the 1,190 feet of track drain pans. The water from the pans drains into one of four vaults, then to the lift station, where it is pumped to the oil/water separator. The oil is transferred by a 1 inch air transfer pump to a 5,000 gallon storage tank in the secondary treatment building. The water is pumped into a 12,500 gallon storage tank also located in the secondary treatment building. When the tank gets close to full, Olympus Environmental samples the water for laboratory analysis to verify that it meets permit BTEX and Benzene Limits. If the limits are exceeded the water in the tank is aerated for several hours and re sampled. The water is not discharged until it meets permit requirements. MRL has installed a new flow meter at the discharge to track gallons discharged as well as calculation on tank size and depth. The discharge is measured and a monthly report is sent to the City of Helena with the amount of water discharged to be billed and the analytical report.

See attached pictures.

Products:

PROCESS/OPERATIONS continued:

Floor drain(s) located in process areas?	**X YES ☐ NO**	**Potential for spill to reach sanitary sewer?**	**X YES ☐NO**
	If YES, location of each drain: OIL WATER SEPERATOR BUILDING		
Adequate spill containment in process areas?	**X YES NO**		
	If NO, explain: THERE IS SPILL CONTAINMENT AVAILABLE FOR THE LIFT STATION AND STORM WATER DRAINS. THERE ARE COVERS FOR STORM WATER DRAINS IN THE EVENT OF A SPILL.		

IV. WASTE:

Discharged Waste Streams (*to sanitary sewer*)

Waste Streams Discharged to Sanitary Sewer	Volume Generated (Per Day, Month, etc.)	Discharge Frequency
STORED WATER AFTER OIL/WATER SEPERATOR	82,407 GALLON PER YEAR	APPROXIMATLEY MONTHLY
Does the Facility treat the process water in any way *before* discharging to the sanitary sewer?	**X YES**	**☐ NO**
If YES, describe the system and identify the waste streams treated: **Waste Water is collected from 1,190 feet of track drain pans. In 2017 additional curbing was added for extra spill containment and the refueling station. This water is collected in an independent drain system that is piped to a lift station. The lift station contains 2 air operated pumps which operate off of floats that pump the waste water into an oil water separator. Waste oil is pumped from the separator into a 5,000 gallon storage container then off loaded to train tank and shipped to Livingston Montana for disposal. The Waste water from the separator is pumped to a 12,500 gallon storage tank. When this tank gets almost full MRL has this water sampled and if needed they aerate this water and resample until it is with in the limits of there discharge permit. Then the water is discharged into the City of Helena Sanitary Sewer through a flow measuring device. A mechanical flow meter was installed in 2017 as well. Total amount discharged and analytical results of all samples taken are forwarded to the City of Helena.**		

Non-Discharged Waste Streams (*any type of liquid or solid waste that is not discharged to the sanitary sewer, except DOMESTIC TRASH)* Attach manifests and/or receipts, if applicable.

Waste Streams NOT Discharged to Sanitary Sewer:	WASTE OIL				
Volume Generated (Per Day, Month, etc.):					
Storage Location	SECONDARY TREATMENT BUILDING				
Storage container (AST, UST, drum, tote, etc), number present, and size:	5,000 GALLON METAL TANK				
Staining/ evidence of spills:	NO				
Floor drains in storage area? (Y/N)	NO				
Location of floor drains in storage area?	N/A				
Adequate spill containment? (Y/N)	YES				
If stored outside, are wastes covered? (Y/N)	N/A				
How is the waste handled/ transferred to its storage area?	WHEN FULL THE OIL IS PUMPED INTO A RAIL TANK CAR UTILIZING A PORTABLE PUMP				
Potential for spill to reach sanitary sewer or storm sewer? (Y/N)	NO				
Waste Transporter/ Destination	MRL/ LIVINGSTON MONTANA				
Records Adequate? (Y/N)	NONE PRESENTED				

Evidence of improper disposal/ staining around dumpster(s)?	☐ YES X NO	**If YES, describe:**

V. STORMWATER:

	Location
Storm drains present?	X YES ☐ NO
If YES, and process water can reach them, notify Sewer Maintenance.	

VI. ADDITIONAL INFORMATION:

	Additional Information
Cooling Waters:	☐ YES X NO
Boilers:	☐ YES X NO
Spill Plan:	X YES ☐ NO
Other:	

VII. COMMENTS AND RECOMMENDATIONS:

Comments:	A new discharge flow meter has been installed to help monitor flows on the discharge of the 12,500 gallon aerated tank. BTEX samples taken to Alpine Analytical.
Recommendations:	
Requirements:	A new discharge flow meter has been installed on the discharge line.

Photographs:

Fig 1.

Fig 2.

Fig 3.

Fig 4.

Fig 5.

Fig 6.

Fig 7.